

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITE HERE HEALTH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION
vs.	)	
	)	NO. 14 C 9320
STARLIGHT EVENTS, LLC, d/b/a SCORES,	)	
at TRUMP TAJ MAHAL,	)	JUDGE ROBERT M. DOW, JR.
	)	
Defendant.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on June 30, 2015, request this Court enter judgment against Defendant, STARLIGHT EVENTS, LLC, d/b/a SCORES, at TRUMP TAJ MAHAL. In support of that Motion, Plaintiffs state:

1. On June 30, 2015, this Court entered default against Defendant and set the matter for prove-up on August 12, 2015.

2. Defendant has submitted its monthly fringe benefit contribution report for June 2015 but has failed to remit the contributions due in the amount of \$6,408.37. (See Affidavit of Dean Dailey).

3. Defendant remitted its monthly fringe benefit contribution reports for the work months of March 2015 through May 2015 but untimely remitted payment of the contributions due thereon and accordingly has incurred accrued interest and liquidated damages calculated through August 2, 2015 totaling \$178.66.

4. In addition, Plaintiffs' firm has expended \$1,090.00 in costs and the total amount of \$2,270.00 in attorneys' fees in this matter. (See Affidavit of Laura M. Finnegan).

5. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$9,947.03.

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$9,947.03.

/s/ Laura M. Finnegan

Laura M. Finnegan  
Attorney for the Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6210637  
Telephone: (312) 216-2563  
Facsimile: (312) 236-0241  
E-Mail: [lmfinnegan@baumsigman.com](mailto:lmfinnegan@baumsigman.com)

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have served the above-referenced document by facsimile and US Mail to the following non-CM/ECF participant on or before the hour of 4:00 p.m. this 5th day of August 2015:

Mr. Mark Yackow  
Starlight Events, LLC  
d/b/a at Scores at Trump Taj Mahal  
1000 Boardwalk, 2nd Floor  
Atlantic City, NJ 08401  
[my@pecnyc.com](mailto:my@pecnyc.com)

/s/ Laura M. Finnegan \_\_\_\_\_

Laura M. Finnegan  
Attorney for Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 2200  
Chicago, IL 60606-5231  
Bar No.: 6210637  
Telephone: (312) 216-2563  
Facsimile: (312) 236-0241  
E-Mail: [lmfinnegan@baumsigman.com](mailto:lmfinnegan@baumsigman.com)